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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SANDRA HERRERA,

Plaintiff,

vs.

FLORENCE MCCLURE WOMEN'S
CORRECTIONAL CENTER FACILITY;
STATE OF NEVADA ex rel. NEVADA
DEPARTMENT OF CORRECTIONS, a
Political Subdivision of the State of Nevada;
TIMOTHY CALUMPONG, Director of
Nursing, FMWCC, and individually; BETTY
S. OMANDAC, Nurse Practitioner, FMWCC,
and individually; ELLA CORDOVEZ, Nurse
Practitioner, FMWCC, and individually;
GABRIELA NAJERA, Warden, FMWCC,
and individually; MICHAEL MINEV,
Medical Director, NDOC and individually;
CHARLES DANIELS, Director, NDOC, and
individually; DOE INDIVIDUALS 1-100,
inclusive; ROE CORPORATIONS 1-100,
inclusive;

Defendants.

CASE NO.: 2:23-cv-01397-JAD-BNW

**STIPULATION TO EXTEND
PLAINTIFF'S RESPONSE DEADLINE
FOR DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT [ECF NO. 28]
(SECOND REQUEST)**

Plaintiff, SANDRA HERRERA, by and through attorney of record, JAMES D. URRUTIA,
ESQ. of LJU LAW FIRM, and State Defendants, by and through their attorney of record, MAYRA
GARAY, ESQ., of the OFFICE OF THE ATTORNEY GENERAL hereby submit their stipulation

1 and agreement to extend the deadline for Plaintiff to respond to Defendants' Motion for Summary
2 Judgment [ECF 28] and respectfully request that the Court extend the response deadline for a period
3 of twenty-one (21) days, making Plaintiff's Response to Defendants Motion for Summary due on
4 Thursday, May 8, 2025. The parties request is supported in good cause.

5 Plaintiff's counsel is diligently working and conducting thorough research to respond to
6 Defendants' Motion for Summary Judgment. However, due to an extended period of absence from
7 the jurisdiction, additional time is required to file a formal response.

8 Dated this 14th day of April, 2025.

Dated this 14th day of April, 2025.

9 **LJU LAW FIRM**

OFFICE OF THE ATTORNEY GENERAL

10
11 /s/ James D. Urrutia

12 JAMES D. URRUTIA, ESQ.

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14 7575 Vegas Drive, Suite 100

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16 *Counsel for Plaintiff*

/s/ Mayra Garay

MAYRA GARAY, ESQ.

(Bar No.)

1 State of Nevada Way, Suite 100

Las Vegas, NV 89119

Counsel for Defendants

17 **IT IS SO ORDERED.**

18 **DATED:** 4/16/2025

19 
20 **UNITED STATES MAGISTRATE JUDGE**

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